

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)**

NEARSHORE CALL CENTER SERVICES	*	
Plaintiff/Judgment Creditor	*	
v.	*	Civil Action No. 08-CV-439
EDISON RESPONSE, LLC	*	
d/b/a BLUEHIPPO	*	
Defendant/Judgment Debtor	*	

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**STATEMENT OF NEARSHORE’S COSTS AND ATTORNEYS’ FEES PERTAINING
TO ITS MOTION TO COMPEL AND FOR SANCTIONS**

Plaintiff/Judgment Creditor, Nearshore Call Center Services (“Nearshore”), by and through its attorneys, James W. Bartlett, III, Alexander M. Giles, and Semmes, Bowen & Semmes, hereby submits a detailed statement of its costs and attorneys’ fees pertaining to its Motion to Compel and for Sanctions, as requested by Magistrate Judge Paul Grimm’s Letter Order dated November 12, 2009. In support thereof, Nearshore states as follows:

Attorneys Fees Incurred by Julie Rannik Houston:

10/20/2009	1.5 hours	\$165/hour	\$247.50	Prepare Motion to Compel Discovery Responses and for Sanctions, Certificate of Good Faith, and Proposed Order
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Subtotal for Julie Rannik Houston - \$247.50

Attorneys Fees Incurred by Alexander Giles:

10/16/2009	.2 hours	\$220/hour	\$44.00	E-mail from/to Julie Houston regarding Motion to Compel and previous pleadings
10/16/2009	.1 hours	\$220/hour	\$22.00	E-mail from Julie Houston regarding notice to Edison
10/16/2009	.2 hours	\$220/hour	\$44.00	E-mail to Andrew Campbell and John Burcham regarding discovery responses in aid of execution.
10/20/2009	.1 hours	\$220/hour	\$22.00	Receipt of draft Motion to Compel, Certificate of Good Faith, and Proposed Order from Julie Houston.
10/22/2009	.9 hours	\$220/hour	\$198.00	Review and analysis of draft Motion to Compel and prepare revisions to Motion and Certificate of Good Faith
10/22/2009	.2 hours	\$220/hour	\$44.00	E-mail to/from Julie Houston regarding draft pleadings
10/23/2009	.2 hours	\$220/hour	\$44.00	Revise Motion to Compel and for Sanctions
10/23/2009	.2 hours	\$220/hour	\$44.00	Electronically file Motion to Compel and for Sanctions with United States District Court
10/23/2009	.2 hours	\$220/hour	\$44.00	Scan and e-mail copy of Motion to Compel and attachments to Andrew Campbell and John Burcham

Subtotal for Alexander Giles - \$506.00

**** TOTAL COSTS AND ATTORNEYS INCURRED -- \$753.50**

WHEREFORE, Plaintiff/Judgment Creditor Nearshore Call Center Services respectfully requests that this Court enter an Order approving the afore-mentioned Costs and Attorneys' Fees of \$753.50 incurred on behalf of Nearshore pertaining to its Motion to Compel Discovery and for Sanctions.

/s/

James W. Bartlett, III, Esquire
Alexander M. Giles, Esquire
Semmes, Bowen & Semmes
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Attorneys for Plaintiff/Judgment Creditor,
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of November, 2009, a copy of the foregoing Statement of Nearshore's Costs and Attorneys' Fees Pertaining to its Motion to Compel Discovery and for Sanctions was sent via e-mail and first-class mail, postage prepaid, to Andrew Campbell, Esquire, General Counsel, John Burcham, Esquire, Assistant General Counsel, Edison Response, LLC, 7000 Security Boulevard, 2nd Floor, Baltimore, Maryland 21224.

/s/

Alexander M. Giles

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